

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

Return Date: January 27, 2011  
Return Time: 10:00 am

\_\_\_\_\_  
In Re:

Chapter 7

Keith Chandler  
\_\_\_\_\_

Index No. 08-10360

NOTICE OF HEARING UNDER 11 U.S.C. § 330  
TO CONSIDER APPLICATION FOR ALLOWANCE  
OF COMPENSATION AND REIMBURSEMENT OF  
EXPENSE BY BLEICHMAN & KLEIN,  
ATTORNEY FOR DEBTOR

SIRS:

PLEASE TAKE NOTICE, that a hearing to consider an application for allowance of compensation for fees and reimbursement of expenses incurred during the period of October 17, 2007, through October 9, 2009, for Bleichman & Klein, counsel for the Debtors, in the total sum of \$9,740.50, less the sum of \$5,174.00 paid on account, together with reimbursement of actual and necessary out-of-pocket expenses in the sum of \$684.00, less the sum of \$-0- received on account, will be held before the Hon. Shelley C. Chapman, Southern District Bankruptcy Court, One Bowling Green, New York, NY 10004-1408, on the 27<sup>th</sup> day of January, 2011, at 10:00 a.m. of said date.

PLEASE TAKE FURTHER NOTICE, that a complete copy of the application is available for examination on the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) and is also available upon written request of the application from the attorney for the Debtor.

PLEASE TAKE FURTHER NOTICE, that objections filed by the parties with legal representation shall be filed (a)(i) through the Bankruptcy Court's electronic filing system (in accordance with General Order M-182) which may be accessed (with a password which is available by contacting the Bankruptcy Court's technical assistance at

(914) 390-4060, Monday through Friday, 8:30 a.m. to 5:00 p.m.) through the Internet at the Bankruptcy Court's website: [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), using Netscape Navigator software 3.0 or higher, and (ii) in portable document format (PDF) using Adobe Exchange software for conversion; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the document refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use the PDF format, such party shall submit the objection on diskette in either Word, WordPerfect or Dos text format.

An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph.

Dated: Spring Valley, New York  
December 16, 2010

\_\_\_\_\_/s/\_\_\_\_\_  
Joshua N. Bleichman  
Bleichman and Klein  
268 Route 59  
Spring Valley, NY 10977  
(845) 425-2510

**SOUTHERN DISTRICT OF NEW YORK**

**x**

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APPLICATION FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF EXPENSES BY BLEICHMAN & KLEIN,  
ATTORNEY FOR DEBTOR, PURSUANT TO 11 U.S.C. § 330

TO THE HON. SHELLEY C. CHAPMAN - U.S. BANKRUPTCY JUDGE:

The application of Joshua N. Bleichman (the "Applicant"), attorney for Debtor, Keith Chandler (the "Debtor"), respectfully shows and represents:

1. This is an application for compensation pursuant to § 330 of the Bankruptcy Code (11 U.S.C. § 101 et seq.) (the "Code") covering legal services rendered by my firm from October 17, 2007, through October 9, 2009, plus necessary and reasonable disbursements for the period October 17, 2007, through October 9, 2009, for your Applicant.
2. Your Applicant was substituted as counsel for the Debtor, and my partner, Shmuel Klein, performed the earlier work on the file.
3. Shmuel Klein has been engaged in private practice for over twenty (20) years with a focus on bankruptcy as attorney for debtors, and other consumer law matters.

FORMAT OF APPLICATION

6. In order to inform the Court of the nature, extent, detail and complexity of the services rendered, and for the Court to have an overall picture of Bleichman & Klein's activities on behalf of the Debtor, your Applicant has set forth below a summary of the services rendered.

7. The professional services for which allowances are sought were rendered solely on behalf of the Debtor and not on behalf of any other person. The Debtor has agreed, subject to further review and order of the Bankruptcy Court, that the Applicant's billing rate would be \$385.00 per hour. (See Retainer Agreement, attached hereto as Exhibit "A").

8. Bleichman & Klein maintains precise and detailed records of time expended in the rendition of all professional services. The actual time expended has been summarized, along with a schedule of expenses and is set forth in Exhibit "B" which is annexed hereto.

9. The services rendered by Shmuel Klein as attorney for the Debtor for which compensation is sought include the following:

- A. Preparation and filing a Chapter 13 for Debtor, then converting it to a chapter 11, followed by converting the bankruptcy yet again to a Chapter 7.
- B. Opposing various Motions by Trustees and by creditors.
- C. Several Court appearances.
- D. Numerous phone calls, correspondence, and hours of preparation of documents.

10. The legal services performed by the Bleichman & Klein have been described above. It is virtually impossible to set forth in this application the specific details of each and every service rendered; however, the time records annexed hereto provide detailed and specific descriptions of each and every activity performed by Mr. Klein (aside from the regular bankruptcy work which was included in the initial bankruptcy fee), and the Court is respectfully referred to the records attached to review Bleichman & Klein's activities

during the period set forth herein. When it was possible, efforts were made to minimize the cost to the Debtor. Duplicate efforts were avoided if possible.

11. During the course of Shmuel Klein's retention and during the period of the request herein, your Applicant has rendered an aggregate total of 25.9 hours of billable professional services to the Debtor, outside of the regular bankruptcy services covered by initial fee agreement. The professional services rendered by Shmuel Klein were material, necessary and beneficial to the estate and demanded a high degree of applicant's professional competence. Your Applicant, at all times, sought to render such services in a timely and cost effective manner. Your Applicant has also attempted to avoid any duplication of services performed.

12. Based on the usual and customary fees charged by Bleichman & Klein, the total fees are \$9,740.50.

13. During the period covered by this application, Bleichman & Klein has been sending regular invoices to the Debtor and has received the sum of \$5,174.00 on account of the bankruptcy services rendered to the Debtor.

14. Your Applicant also seeks to be reimbursed for actual out-of-pocket expenses in the sum of \$684.00. The disbursements for which your Applicant seeks recovery are itemized in Exhibit "B" annexed hereto.

15. No prior application for this or similar relief has heretofore been made.

16. No agreement prohibited by 18 U.S.C. § 155 has been made heretofore.

17. Annexed hereto as Exhibit "C" is a Certification by your Applicant made pursuant to the administrative guidelines for reviewing applications for compensation as promulgated by the U.S. Trustee.

WHEREFORE, your Applicant requests that he be granted allowance for compensation for professional services rendered, as set forth in this application, in the sum of \$9,740.50, less the sum of \$5,174.00 paid on account, and for actual out-of-pocket expenses in the sum of \$684, for a balance of \$5,250.50, together with such other and further relief as to the Court may seem just and proper.

Dated: Spring Valley, New York  
December 16, 2010

\_\_\_\_\_/s/\_\_\_\_\_  
Joshua N. Bleichman  
Bleichman and Klein  
268 Route 59  
Spring Valley, NY 10977  
(845) 425-2510